## LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W. SUITE 1200 WASHINGTON, DC 20036 (202) 857-3500

WRITER'S DIRECT DIAL (202) 828-9475

August 4, 2003

## **VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Room TW-B204 Washington, DC 20554

Re: Notice of Oral *Ex Parte* Communication, WT Docket Nos. 94-102, 02-377

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. Section 1.1206, we hereby provide you with notice of an oral *ex parte* presentation in connection with the above-captioned proceedings. On Friday, August 1, 2003, representatives of Rural Cellular Association ("RCA") met with Bryan Tramont, Senior Legal Advisor to Chairman Michael K. Powell, to discuss discussed problems encountered by rural and small market wireless carriers in the deployment of Phase II of E911. In addition to undersigned counsel, RCA board members Janice Wiese, Terry Addinton, John Rogers, Dan Rule, and Tom Walsh participated in the meeting on RCA's behalf.

During the meeting there was discussion of obstacles to compliance encountered by many members of RCA relating to current FCC deadlines for Phase II implementation and to the location accuracy standards contained in the Commission's rules. There was also discussion of the lack of immediately available GSM handsets with Phase II capability, and the general inability of carriers in rural areas to meet accuracy requirements due to cell site configuration and terrain limitations.

Sincerely,

/<sub>S</sub>/

David A. LaFuria Counsel for Rural Cellular Association

cc: Bryan Tramont, Esq.